

[ORAL ARGUMENT SCHEDULED FOR MAY 16, 2025]

Nos. 25-5037, 25-5055, & 25-5057

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**IN THE UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

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CATHY A. HARRIS, IN HER PERSONAL CAPACITY AND IN HER OFFICIAL  
CAPACITY AS MEMBER OF THE MERIT SYSTEMS PROTECTION BOARD,  
*Appellee,*

v.

SCOTT BESENT, IN HIS OFFICIAL CAPACITY AS SECRETARY OF THE TREASURY,  
ET AL.,  
*Appellants.*

GWYNNE A. WILCOX,

*Appellee,*

v.

DONALD J. TRUMP, IN HIS OFFICIAL CAPACITY AS PRESIDENT OF THE UNITED  
STATES, et al.,

*Appellants.*

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*On Appeal from the United States District Court for the District of Columbia*

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**NOTICE OF INTENT OF CONSTITUTIONAL ACCOUNTABILITY CENTER TO  
PARTICIPATE AS *AMICUS CURIAE*  
IN SUPPORT OF APPELLEES**

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Elizabeth B. Wydra  
Brienne J. Gorod  
Brian R. Frazelle  
Smita Ghosh  
Margaret Hassel  
CONSTITUTIONAL  
ACCOUNTABILITY CENTER  
1200 18th Street NW, Suite 501  
Washington, D.C. 20036  
(202) 296-6889  
brienne@theusconstitution.org

*Counsel for Amicus Curiae*

**CORPORATE DISCLOSURE STATEMENT**

Pursuant to Rule 26.1 of the Federal Rules of Appellate Procedure, *amicus curiae* states that no party to this brief is a publicly held corporation, issues stock, or has a parent corporation.

**NOTICE OF INTENT AND REPRESENTATION OF CONSENT  
TO FILE BRIEF OF *AMICUS CURIAE***

Pursuant to D.C. Circuit Rule 29 and the guidance set forth in Section IX.A.4 of the Court's *Handbook of Practice and Internal Procedure*, the Constitutional Accountability Center hereby gives notice that it intends to file a brief as *amicus curiae* in support of Appellees Gwynne Wilcox and Cathy Harris in these consolidated matters. All parties have consented to the filing of this brief.

Respectfully submitted,

/s/ Brianne J. Gorod

Elizabeth B. Wydra

Brianne J. Gorod

Brian R. Frazelle

Smita Ghosh

Margaret Hassel

CONSTITUTIONAL

ACCOUNTABILITY CENTER

1200 18th Street NW, Suite 501

Washington, D.C. 20036

(202) 296-6889

brianne@theusconstitution.org

*Counsel for Amicus Curiae*

Dated: April 9, 2025

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the D.C. Circuit by using the appellate CM/ECF system on April 9, 2025.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system.

Executed this 9th day of April, 2025.

/s/ Brianne J. Gorod

Brianne J. Gorod

*Counsel for Amicus Curiae*